

TUVQPAÖÜÖVÖÖ
Kevin H. Sharp

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA)	
)	
v.)	No. 3:13-cr-00059
)	JUDGE SHARP
)	
JASON GLYNN)	

MOTION TO EXTEND DEADLINE

Undersigned counsel respectfully and timely files this Motion to extend the time within which the defense may file pre-trial motions until October 13th, 2015, two days prior to a scheduled status conference in the case (Docket No. 30). As detailed in previous continuance motions (Docket No. 27), this has been a complex case, and counsel seeks a brief amount of additional time (prior to the scheduled status conference) to consult with the Government prior to filing motions.

It is in the interests of justice that necessary pre-trial motions be filed, and counsel does not wish to potentially waive any pre-trial motions by failing to timely request an extension, or to file necessary motions prior to consulting with opposing counsel as required by local rules. Counsel is mindful of the Court's requirement that an extension request or motions be timely filed, and thus very respectfully and timely asks the Court for this brief extension of the motions filing deadline in advance of the scheduled status conference.

Respectfully submitted,

Jones Hawkins & Farmer, PLC

/s/ William J. Steed III

WILLIAM J. STEED III
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